

**EQUALITY IMPACT ASSESSMENT (EIA) FORM**

<b>Name of Policy:</b>	Introduction of the policy for Waste collections from private or unadopted roads.
<b>Lead Officer (responsible for assessment):</b>	James Khan
<b>Department:</b>	Waste
<b>Others Involved in the Assessment (i.e. peer review, external challenge):</b>	
<b>Date EIA Completed:</b>	10/09/2019

**What is an Equality Impact Assessment (EIA)?**

As part of any effective policy development process, it is important to consider any potential risks to those who will be affected by the policy's aims or by its implementation. The Equality Impact Assessment (EIA) process helps us to assess the implications of our decisions on the whole community, to eliminate discrimination, tackle inequality, develop a better understanding of the community we serve, target resources efficiently, and adhere to the transparency and accountability element of the Public Sector Equality Duty.

**The word 'policy', in this context, includes the different things that the Council does. It includes any policy, procedure or practice - both in employment and service delivery. It also includes proposals for restructuring, redundancies and changes to service provision.**

- (a) **What is the policy trying to achieve?** i.e. What is the aim/purpose of the policy? Is it affected by external drivers for change? What outcomes do we want to achieve from the policy? How will the policy be put into practice?

The Council currently operates a collection point for waste at the edge of a property where it meets the public highway. When the wheeled bin service was introduced, collections continued from remote properties accessed from private or unadopted roads. Collections from such roads are a health and safety risk to the public and the waste crews.

In addition, there will be maintenance costs for waste collection vehicles which collect from rounds which have private or unadopted roads. It is impossible to estimate the financial cost attributed to these as Veolia didn't routinely record this information, however ECSS are now actively measuring the financial impact.

Private and unadopted roads are not normally built to highways standards: often with soft verges and overhanging trees. Several roads must be reversed down for considerable distances, sometimes in the dark with no safe turning spaces.

The proposed changes will require private or unadopted roads to be made up to a required standard (as detailed within the "project plan: Introduction of the policy for waste collections from private and unadopted roads) and an indemnity agreement must be signed by all house owners located on such roads.

Without a signed indemnity in place covering all associated properties located on a private or unadopted road, all waste must be presented for collection at the public highway.

In instances where road conditions are substandard enough not to safely enable the waste freighters to access the road, then the owner/s on the road will be required to take their waste to the collection point on the public highway.

Waste Services will ensure that all affected residents will be engaged with at the earliest opportunity to minimise any negative impacts from the changes.

Many houses already located on private or un-adopted roads already present their waste at the public highway so the proposed changes won't affect these residents.

The Council and ECSS will engage with all affected home owners to ensure that they are kept up to date.

**(b) Who are its main beneficiaries? i.e. who will be affected by the policy?**

- Owners of properties located on private or unadopted roads
- Vulnerable residents (mitigations to reduce impact of changes will be put in place e.g. collections made from smaller vehicles etc)
- The waste collection crews
- ECDC as the asset owner
- ECSS as the employer

**(c) Is the EIA informed by any information or background data (quantitative or qualitative)? i.e. consultations, complaints, applications received, allocations/take-up, satisfaction rates, performance indicators, access audits, census data, benchmarking, workforce profile etc.**

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- Waste collection crews have been raising concerns about the conditions on some private or unadopted roads being healthy and safety risks including having soft verges, no turning circles, crews having to reverse vehicles in narrow roads for considerable distances and often in the dark etc
- The increases in maintenance costs from collection vehicles which collect from private/unadopted roads shows the financial impact of continuing to collect waste from these roadways

**(d) Does this policy have the potential to cause a positive or negative impact on different groups in the community, on the grounds of any of the protected characteristics?** (please tick all that apply)

<b>Ethnicity</b>	<input type="checkbox"/>	<b>Age</b>	<input checked="" type="checkbox"/>
<b>Gender</b>	<input type="checkbox"/>	<b>Religion and Belief</b>	<input type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<b>Sexual Orientation</b>	<input type="checkbox"/>
<b>Gender Reassignment</b>	<input type="checkbox"/>	<b>Marriage &amp; Civil Partnership</b>	<input type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>	<b>Caring Responsibilities</b>	<input type="checkbox"/>

**Please explain any impact identified:** i.e. What do you already know about equality impact or need? Is there any evidence that there is a higher or lower take-up by particular groups? Have there been any demographic changes or trends locally? Are there any barriers to accessing the policy or service?

Residents who live in houses located on private or un-adopted who are disabled or unable to present their waste to the public highway have the opportunity to register for an assisted collection. Therefore any residents who can show evidence that they meet the criteria for an assisted collection will still be able to have their waste collected from their property if all other necessary criteria is met.

<b>(e) Does the policy have a differential impact on different groups?</b>	<input type="checkbox"/>	<b>NO</b>
<b>(f) Is the impact <i>adverse</i> (i.e. less favourable)?</b>	<input type="checkbox"/>	<b>NO</b>
<b>(g) Does it have the potential to disadvantage or discriminate unfairly against any of the groups in a way that is unlawful?</b>	<input type="checkbox"/>	<b>NO</b>

**(h) How have you engaged stakeholders in gathering evidence or testing the policy proposals?** Who was involved, how and when where they engaged? Does the evidence show potential for differential impact? How will you mitigate any negative impacts? Where there is the potential for an adverse impact that cannot be addressed immediately, these should be highlighted in your recommendations and objectives at the end of the EIA.

ECSS has undertaken a review of each private and un-adopted road to ascertain the quality of the road against standards required by the Highways Agency. If the proposal is agreed then the Council will engage with affected homeowners as per the project timescales.

\* The Consultation Register is available to assist staff in consulting with the Council's stakeholders.

**(i) Summarise the findings of your research and/or consultation (please use a separate sheet if necessary).**

N/A

**(j) What are the risks associated with the policy in relation to differential impact and unmet needs/requirements?** i.e. reputation, financial, breach of legislation, service exclusion, lack of resources, lack of cooperation, insufficient budget etc.

If the proposed policy change isn't agreed then there will be the following;

- A continued health and safety risk to residents
- A continued health and safety risk to crews
- On-going financial impacts on ECSS due to additional costs of excessive, avoidable wear and tear on vehicles going down poor standard private and un-adopted roads
- ECSS' and ECDC costs will increase if the policy is not adopted due to the potential for additional insurance claims and damage to the vehicles (which are owned by ECDC).

**(k) Use the information gathered in the earlier stages of your EIA to make a judgement on whether there is the potential for the policy to result in unlawful discrimination or a less favourable impact on any group in the community, and what changes (if any) need to be made to the policy.**

Option 1:	<b>No major change</b> - the evidence shows that the policy is robust and no potential for discrimination.	√
Option 2:	<b>Adjust the policy</b> - to remove barriers or to better promote equality.	
Option 3:	<b>Continue the policy</b> - despite potential for adverse impact or missed opportunity to promote equality, provided you have satisfied yourself that it does not unlawfully discriminate.	
Option 4:	<b>Stop and remove the policy</b> – if the policy shows adverse effects that cannot be justified.	

**(l) Where you have identified the potential for adverse impact, what action can be taken to remove or mitigate against the potential for the policy to unlawfully discriminate or impact less favourably on one or more communities in a way that cannot be justified?** Include key activities that are likely to have the greatest impact (max. 6). Identified actions should be specified in detail for the first year but there may be further longer term actions which need to be considered. To ensure that your actions are more than just a list of good intentions, include for each: the person responsible for its completion, a timescale for completion, any cost implications and how these will be addressed. It is essential that you incorporate these actions into your service plans.

This completed EIA will need to be countersigned by your Head of Service. **Please forward completed and signed forms to the Principal HR Officer.**

All completed EIAs will need to be scrutinised and verified by the Council's Equal Opportunities Working Group (EOWG) and published on the Council's Intranet to demonstrate to local people that the Council is actively engaged in tackling potential discrimination and improving its practices in relation to equalities. Please be aware that you may be asked to attend a half-an-hour session to summarise the findings of the EIA to the Scrutiny and Verification panel.

**Signatures:**

**Completing Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Head of Service:** \_\_\_\_\_ **Date:** \_\_\_\_\_